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May 4, 2007

Via electronic filing

Ms. Rosa G. Lewis  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

RE: SEIU COPE, FEC ID C00004036  
Amended 2006 Year End Report (11/28/06 - 12/31/06), received 2/16/07

Dear Ms. Lewis:

I am counsel for the Service Employees International Union Committee on Political Education (SEIU COPE). This is in response to your letter dated April 4, 2007, regarding the Amended 2006 Year End Report filed by SEIU COPE on 2/16/07. In that letter you raise questions regarding independent expenditures on behalf of certain candidates reported by SEIU COPE on Schedules E of its Report. In response to those questions, SEIU COPE respectfully submits as follows:

Ben Cardin

The \$35.63 independent expenditure for polling place literature supporting senate candidate Ben Cardin was incurred prior to the election. The literature was disseminated on Election Day and as such no 24 hour notice was required. The payment for this literature was reported on the Year End Report and the Post-General Report will be amended to reflect this debt.

On 11/5/04 SEIU COPE filed a 24 hour notice for a pre election GOTV effort in support of senate candidate Ben Cardin. The estimated cost of this independent expenditure was \$2,538 to be paid to SEIU (General Fund). The actual costs of the GOTV effort exceeded the estimate by \$10, 854.78. The payment to the MD/DC State Council. SEIU for the excess costs was reported on SEIU COPE s Year End Report and its Post-General Report will be amended to reflect this debt

Christopher Carney

On 11/5/04 SEIU COPE filed a 24 hour notice for a pre election GOTV effort in support of congressional candidate Christopher Carney. The estimated cost of this independent expenditure was \$2125 to be paid to SEIU (General Fund). The actual amount of this independent expenditure exceeded the estimate by \$422.36. This additional payment was a reimbursement for miscellaneous travel expense made directly to Neal Gorfinkle, and was reported on the Year End Report and the Post-Election Report will be amended to reflect this debt.

Chris Van Hollen

The \$35.62 independent expenditure for polling place literature supporting congressional candidate Chris Van Hollen was incurred prior to the election. The literature was disseminated on Election Day and as such no 24 hour notice was required. The payment for this expense was reported on the Year End Report and the Post-General Report will be amended to reflect this debt.

Jason Altimire

SEIU COPE filed a 24 hour notice for a pre election GOTV canvass effort in support of congressional candidate Jason Altimire on 11/3/2006. This notice incorrectly identified SEIU Local 4 as the vendor for the canvas workers, the correct vendor was the Pennsylvania State Council, SEIU. The actual amount of the independent expenditure for the GOTV canvass effort exceeded the estimate disclosed in the 11/3/2006 notice. Payments to the Pennsylvania State Council,

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**ETEXT ATTACHMENT**

SEIU for this independent expenditure are reported on the Year End Report. The Post-General Report will be amended to reflect the unpaid amounts as debt to the Pennsylvania State Council.

Tessa M. Hafen

SEIU COPE filed a 24 hour notice for a pre election GOTV canvass effort in support of congressional candidate Tessa M. Hafen on 11/4/2006. The estimated cost of this independent expenditure was \$15,987.86 to be paid to SEIU United Healthcare West. The actual amount of the independent expenditure paid to SEIU United Healthcare West exceeded the estimate by \$1,514. This additional payment was reported on the Year End Report and the Post-General Report will be amended to reflect this debt.

Tim Walz

SEIU COPE filed a 24 hour notice for an independent expenditure in support of congressional candidate Tim Walz. The estimated cost of this independent expenditure was \$4,500 to be paid to Lit Happens. The actual amount of the independent expenditure exceeded the estimate by \$12,000. This additional payment to Lit Happens was reported on the Year End Report and the Post-General Report will be amended to reflect this debt.

If you have any further questions regarding this matter, please feel free to contact me at 202-730-7465.

Very truly yours,

John J. Sullivan  
Associate General Counsel  
Counsel for Government Affairs

cc: Anna Burger, Treasurer, SEIU COPE  
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